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**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**12:35 pm Jul 18 2017**  
**Clerk U.S. District Court**  
**Northern District of Ohio**  
**Toledo**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Matthew Seifert, a Law Enforcement Agent with the United States Customs and Border Protection, United States Border Patrol, hereinafter referred to as your Affiant, being duly sworn, deposes and states:

**INTRODUCTION**

1. Affiant makes this affidavit in support of a criminal complaint and arrest warrant. This affidavit is made based on my own personal knowledge and derived from credible law enforcement sources. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
2. Based on the information set forth below, your Affiant believes Manuel GRANADOS is a national and citizen of Mexico, is an alien illegally present in the United States, is an imposter utilizing the identity of a United States Citizen named R.P. and has violated the following federal criminal laws: Title 18, United States Code, Section 911 (False personation of a United States citizen), 1015(e) (False statement or claim of citizenship to obtain a federal or state benefit), and 1028A(a)(1) (Aggravated identity theft).

**TRAINING AND EXPERIENCE**

3. Affiant has been a law enforcement agent of the Department of Homeland Security, United States Customs and Border Protection, United States Border Patrol since March of 2010. Affiant has over seven (7) years of specialized law enforcement training and experience to include, but not limited to, the detection and apprehension of undocumented foreign nationals, the detection and investigation of the sale/use of fraudulent documents and the apprehension of fraudulent document users (imposters), and the detection and interdiction of narcotics and human smugglers/traffickers and other criminal individuals. Affiant has been trained in the laws of search and seizure at the United States Border Patrol Academy in Artesia, New Mexico and has received subsequent training in the utilization, preparation, and execution of search and seizure warrants as a member of a multi-jurisdictional narcotics taskforce.
4. Affiant has approximately two (2) years of experience investigating the manufacturing, distribution, and use of controlled substances while being a member of a multi-jurisdictional narcotics taskforce known as the Upper



Peninsula Substance Enforcement Team (UPSET) and has participated in approximately 200 controlled substance investigations. Affiant has utilized informants and undercover officers to conduct the controlled purchases of controlled substances, conducted or participated in surveillance, conducted interviews of both witnesses and suspects, executed felony arrests, and drafted and executed search warrants and other court orders which resulted in the seizure of dangerous drugs, and the records, books, and proceeds derived from illicit activity.

5. Affiant is currently assigned to the Field Intelligence Unit at the Sandusky Bay Border Patrol Station in Port Clinton, Ohio, with the purpose of conducting intelligence driven operations/investigations. Affiant has interviewed, witnessed the interview of, and participated in the debriefing of numerous illegal aliens that have claimed they have purchased fraudulently obtained, altered, or counterfeit documents. Through this experience your affiant has in depth knowledge concerning the trade of fraudulent documents. Affiant has investigated both criminal and administrative violations of law pertaining to immigration, controlled substances, and identity theft.

#### **PROBABLE CAUSE**

6. On May 8, 2017, your affiant received information from Ohio Bureau of Motor Vehicles (BMV) Investigator Jennifer Shaw regarding two possible imposters that attempted to obtain valid Ohio ID cards from the Norwalk BMV on May 6, 2017. These two subjects are suspected to be illegal aliens posing as United States Citizens and attempted to utilize fraudulent Puerto Rican social security cards and birth certificates in order to obtain valid Ohio ID cards.
7. Both subjects listed in paragraph 6 were brought into the Norwalk BMV by a female named Brandie BARNETT and a Hispanic male, who acted as a translator, later identified as Manuel GRANADOS, and utilizing R.P.'s identity.
8. Both subjects listed in paragraph 6 listed an address of 121 Keefer Court APT 3, Willard, OH 44890 on their application for Ohio Driver License or Identification Card.
9. On May 11, 2017, your affiant and Border Patrol Agent (BPA) Christopher Schaeffer conducted surveillance at 121 Keefer Court, Willard, OH 44890 and observed a common parking lot shared by two apartment buildings. Your affiant and BPA Schaeffer observed approximately eleven license plates from the shared parking which included the following license plates registered in the name of R.P.: Ohio GLQ-7095 and Wyoming 458347.
10. On May 12, 2017, your affiant performed records checks on the license plates and registered owners listed in paragraph 9. Records checks performed on R.P. revealed an extensive criminal history in Texas and Louisiana (with R.P.



identified by FBI no. 758405RA4, Texas State ID 05038140 and Louisiana State ID 2484117) and Ohio (with R.P. identified by FBI no. 625663FH1 and Ohio State ID OHC 963308).

11. Open source databases revealed R.P. to have concurrent address in Ohio, Wyoming, and Texas.
12. The criminal histories listed in paragraph 10 are attached to two separate FBI numbers (758405RA4 and 625663FH1), indicating multiple/different sets of fingerprints associated with the name and personal identifiers of R.P.
13. On November 25, 2013, R.P. (FBI no. 758405RA4) was convicted of Burglary of a Coin Operated Collection Machine in Hidalgo County, TX and sentenced to 180 days of confinement. On December 16, 2013 R.P. (FBI no. 625663FH1) was convicted of three driving offenses in Ohio. These driving offenses occurred on December 12, 2013, which was during the time the real R.P. was serving a jail sentence in Hidalgo, TX.
14. Records checks revealed valid driver's license in both Texas (DLN: 35244050) and Ohio (DLN: TW894095) under R.P.'s name. These licenses identified R.P. by the same name and birthdate. Your affiant conducted a photograph comparison of the two driver license photographs and the photographs did not match.
15. CBP obtained booking photographs for R.P. associated with the criminal histories from Texas, Louisiana, and Ohio listed in paragraph 10. Your affiant conducted a photograph comparison of the booking photographs from all three states. The Texas and Louisiana booking photographs match and depict the same person as the Texas Driver License for R.P. listed in paragraph 14. The Ohio booking photograph does not match the Texas and Louisiana booking photographs. But the Ohio booking photograph depicts the same person as the Ohio driver's license of R.P. listed in paragraph 14. (NOTE: The Louisiana booking information identifies R.P. as R.P.G., inverting R.P.'s middle and last name. The Louisiana booking information, however, contains R.P.'s date of birth, place of birth, and social security number.)
16. Ohio booking information was obtained from the Huron County Jail for R.P. This booking information revealed an alias of Manuel GRANADOS (DOB: 07/19/1978). This is believed to be the true name of the individual identified as R.P. in the Huron County Jail booking information.
17. Ohio booking information listed in paragraph 16 lists a contact phone number for R.P. as (567) 224-6374. Open source databases (i.e., Accurant) revealed a second phone number for R.P. as being (419) 677-4526. Both of these phone numbers are linked to the social media account of Manuel GRANADOS (User ID:

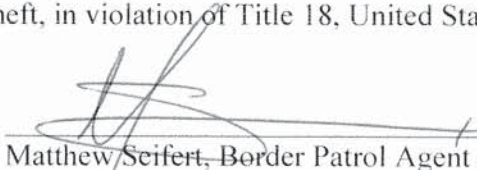
1610344534, URL: [www.facebook.com/manuel.granados.102](http://www.facebook.com/manuel.granados.102) (last accessed on July 12, 2017).

18. The social media account listed in paragraph 17 lists the owner as being from Coatzacoalcos. Coatzacoalcos is a city in the Mexican state of Veracruz.
19. Your affiant conducted a photograph comparison of the Ohio driver's license of R.P. listed in paragraph 14 and the photographs observed on the social media account listed in paragraph 17. These photographs appear to identify the same individual. These photographs identify a different individual from the individual identified as R.P. in the Texas and Louisiana booking information and Texas driver's license.
20. On May 24, 2017, your affiant received information from the Huron County Child Support Enforcement Agency regarding the identity of Manuel GRANADOS in child support case number 7090843769. Documents obtained from Huron County Child Support Enforcement Agency related to Manuel GRANADOS and Case No. 7090843769 revealed the following:
  - a. A LabCorp client authorization form lists Manuel P. GRANADOS (DOB: 07/19/1978) as the "Alleged Father," and lists an ethnicity of "Other: Mexican." The second page of the client authorization includes a thumb print of Manuel GRANADOS and a photograph that depicts the same person as the Ohio Driver License photograph listed in paragraph 14 and the Ohio booking photograph listed in paragraph 15.
  - b. An Ohio Department of Health, Vital Statistics Division birth record verification form lists "Manuel Perez GRANADOS" under the item labelled "Father's Name." This form lists Mexico as a birthplace for GRANADOS.
  - c. An application for child support services lists a possible father as "Manuel GRANADOS, 33YRS of age, Mexican, 6ft 1inch, Phone (419) 677-4526, 106 Front St. Apt C, Willard OH, 44890."
  - d. A recap of an administrative support hearing and administrative affidavit lists Manuel GRANADOS PEREZ (or PEREZ GRANADOS, order undetermined) as "Father" with an address of 14 ½ S. Myrtle Ave APT2, Willard, OH 44890 and a phone number of (419) 677-4526. The recap also lists a birth record change for the child to "GRANADOS."
21. CBP obtained fingerprint cards for R.P. associated with the criminal histories listed in paragraph 10 from Texas, Louisiana, and Ohio. These fingerprint cards along with the LabCorp form listed in paragraph 20.a. were provided to Cleveland Police Department Latent Print Examiner (LTE) Shelby Vernick for fingerprint comparison. The results of the fingerprint comparison determined that the



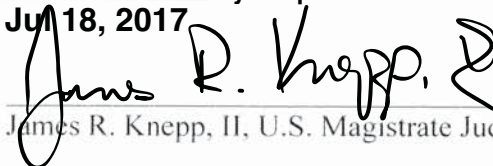
fingerprints on the Texas and Louisiana fingerprint cards were a match but did not match the fingerprints on the Ohio fingerprint card or the thumbprint from the LabCorp form listed in paragraph 20.a. The thumbprint from the Ohio fingerprint card matched the thumbprint from the LabCorp form listed in paragraph 20.a.

22. On May 23, 2017, A Unique Popular Registry (CURP) was obtained from the Yuma Sector Liaison Unit stating that the name Manuel GRANADOS PEREZ (DOB: 07/19/1978, POB: Mexico, Address: DOMICILIO: AV PINO SUAREZ COL PALMA SOLA - COATZACOALCOS, Veracruz de Ignacio de la Llave) is valid. CURP is a valid Mexican document that verifies the name and date of birth of Mexican citizens and residents of Mexico.
23. On May 24, 2017, your affiant received certified Ohio BMV records indicating that Manuel GRANADOS applied for and was issued a valid form of identification under the name R.P. approximately seven times between 03/04/2011 and 04/08/2016. On each application for Driver License / Identification Card / Permit, Manuel GRANADOS is listed as a United States Citizen under the name R.P. On each application, Manuel GRANADOS signed R.P.'s name attesting that the information contained on the application, including citizenship status, was true.
24. Based upon the above information, there is probable cause that Manuel GRANADOS has violated the following federal criminal laws:
  - a. False personation of a United States citizen, in violation of Title 18, United States Code, Section 911;
  - b. False statement under oath in a matter relating to naturalization and citizenship in order to obtain a benefit, in violation of Title 18, United States Code, Section 1015(e);
  - c. Aggravated identity theft, in violation of Title 18, United States Code, Section 1028A

  
Matthew Seifert, Border Patrol Agent  
United States Customs and Border Protection  
Department of Homeland Security

Sworn to before me and signed in ~~XX~~  
in Toledo, Ohio. by telephone and reliable electronic means

Jul 18, 2017

  
James R. Knepp, II, U.S. Magistrate Judge